



# Comprehensive Plan Assessment Report:

*Improving the Format, General Content and  
Usefulness of the District Elements*



Government of the District of Columbia  
Anthony A. Williams, Mayor

Prepared by the Office of Planning  
February 2003

## Key Contributors

### KEY CONTRIBUTORS TO THIS ASSESSMENT

#### Task Force Members

**Pedro Alfonso**

Appointed by Council Member Schwartz

**John Bailey**

Appointed by Council Member Graham

**Wayne Dickson**

Appointed by Council Member Evans

**Jill Diskan**

Appointed by Council Member Mendelson

**Bernard Gray**

Appointed by Council Member Allen

**Ann Hughes Hargrove**

Appointed by Council Chairman Cropp

**Anthony Hood**

Appointed by Council Member Orange

**Ellen Jones**

Washington Area Bicyclist Association

**Gwyn E. Jones**

Sierra Club Washington, DC Chapter

**Steve Jones**

Washington Regional Network for Livable Communities

**Sally Kram**

Consortium of Universities of the Washington Metropolitan Area

**Barbara Lang**

DC Chamber of Commerce

**Mark Loud**

Appointed by Council Member Fenty

**Sue Marshall**

The Community Partnership for the Prevention of Homelessness, Inc.

**John H. (Skip) McKoy,**

Task Force Chair, DC Agenda

**Donald Murray**

Appointed by Council Member Chavous

**Gregory R. New**

DC Federation of Civic Associations

**George H.F. Oberlander**

District of Columbia Preservation League

**Penny Pagano**

Appointed by Council Member Patterson

**Juan J. Patlan**

Latino Economic Development Corporation

**Allison Prince**

Appointed by Council Chairman Cropp

**Marshall Purnell**

American Institute of Architects

**Johnnie M. Scott Rice**

Appointed by Council Member Catania

**Laura Richards**

Federation of Citizens Associations

**Mary Rudolph**

Greater Washington Board of Trade

**Steve Sher**

DC Building Industry Association

**Loretta Tate**

Marshall Heights Community Development Organization

**Gerry Widdicombe**

Appointed by Council Member Brazil

**Dick Wolf**

Appointed by Council Member Ambrose

#### Ex-Officio Members

**Timothy Dimond**

Director, Office of Property Management

**Patti Gallagher**

Director, National Capital Planning Commission

**Anthony Gittens**

Executive Director, Commission on the Arts and Humanities

**Shane Salter**

Chief of Staff, Office of the Deputy Mayor for Children, Youth, Families and Elders

**Stephen Green**

Special Assistant, Office of the Deputy Mayor for Planning and Economic Development

**Gregory McCarthy**

Director, Office of Policy and Legislative Affairs

**Michelle Pourciau**

Deputy Director, District Department of Transportation

**Lucien Coleman**

Public Facilities, DC Public Schools

#### Office of Planning Project Team

**Andrew Altman**

Director

**Ellen McCarthy**

Deputy Director, Development Review and Historic Preservation

**Julie Wagner**

Acting Associate Director, Comprehensive Planning and Project Manager

**John Fondersmith**

Development Review Specialist

**Barry Miller**

Contract Planner

#### Consultant Team

**HNTB Corporation**

Jane Dembner and Uri Avin  
Planning and Urban Design, Overall Project Management

**Justice & Sustainability Associates**

Don Edwards and Laura Gramling  
Task Force Facilitation

**Community Building Institute**

Bill Potapchuk  
Guidance on Plan Structure/Process

# Table of Contents

## TABLE OF CONTENTS

|  |           |
|--|-----------|
| <b>I. OVERVIEW AND BACKGROUND .....</b>                        | <b>1</b>  |
| About This Report .....  | 1         |
| A Unique Framework.....  | 1         |
| How This Report is Organized .....                             | 2         |
| <b>II. SUMMARY FINDINGS AND OP RECOMMENDATIONS .....</b>       | <b>3</b>  |
| A. Undertake a Major Revision of the Comp Plan .....           | 3         |
| B. Create a More Functional and Dynamic Plan .....             | 4         |
| C. Clarify the Comp Plan's Relationship to Other Plans .....   | 6         |
| D. Ensure Comp Plan Implementation .....                       | 8         |
| E. Improve the Amendment Process .....                         | 9         |
| F. Consider a Planning Commission.....                         | 10        |
| <b>III. ASSESSMENT PROCESS.....</b>                            | <b>11</b> |
| Information Sources.....                                       | 11        |
| Chronology .....   | 12        |
| <b>IV. DETAILED RECOMMENDATIONS AND TASK FORCE VIEWS .....</b> | <b>15</b> |
| Determining Whether a Major Revision is Needed .....           | 16        |
| Making the Comp Plan More Functional and Dynamic.....          | 22        |
| Improving Plan Content .....                                   | 22        |
| Improving Plan Structure .....                                 | 27        |
| Clarifying the Comp Plan's Relationship to Other Plans .....   | 32        |
| Assessing How to Improve Implementation of the Comp Plan.....  | 37        |
| Assessing How to Improve the Amendment Process.....            | 42        |
| Considering the Merits of a Planning Commission.....           | 50        |
| <b>V. NEXT STEPS.....</b>                                      | <b>55</b> |

## Table of Contents

### EXHIBITS

|           |  |    |
|-----------|--|----|
| Figure 1: | Proposed Timeline for Plan Revision.....                   | 21 |
| Figure 2: | Amendment Timeline .....                                   | 46 |
| Figure 3: | Election and Future Plan Update and Amendment Cycles ..... | 47 |
| Chart 1:  | Neighborhood Plans in Other Cities .....                   | 28 |
| Chart 2:  | Subarea Planning Goals and Approaches .....                | 30 |
| Chart 3:  | Planning Commission Options .....                          | 52 |

The Appendix to this report is contained in a separate document available through the Office of Planning. It contains the following items:

- Letter from Mayor Anthony A. Williams to Chairman Linda W. Cropp, recommending an assessment of the Comprehensive Plan.
- The full text of the Comprehensive Plan Process Sense of the Council Resolution 2002 (Resolution 14-231), that requested that the Office of Planning conduct an assessment of the Comprehensive Plan.
- The full text of the Mayor's Order (2002-133) that established the Comprehensive Plan Process Task Force.
- A series of analysis papers produced by consultants and the Office of Planning as part of the assessment process.
- Summaries of a series of worksheets that were completed by the Task Force members during the assessment process. The purpose of the worksheets was to provide a way for the Task Force members to record their preliminary thoughts and views on the Comprehensive Plan.

# Overview and Background

## I. OVERVIEW AND BACKGROUND

### About This Report

This report presents an assessment of the District Elements of the Comprehensive Plan (hereafter referred to as the "Comp Plan"). It includes a series of recommendations to make the Comp Plan — and the planning process in the District of Columbia — stronger and more effective. This process began with a letter from Mayor Anthony A. Williams to Council Chair Linda Cropp, proposing to revise the date of the Comp Plan amendments and to conduct this assessment.

The specific issues examined by the assessment were outlined by the City Council in Resolution 14-231, adopted in May 2002. This Resolution established a Task Force to review the process of amending the Comp Plan and to recommend improvements to the process, format, content and usefulness of the plan. Specific areas of focus included:

- How long-range capital budgeting and the Comp Plan should be linked
- How to improve the planning process
- Best planning practices from other cities
- The relationship between the Comp Plan and other District plans
- The problems with the current Comp Plan and planning process

The assessment did not seek to re-draft the Comp Plan itself. Instead the goal was to lay the

foundation for a more workable Comp Plan and a more productive long-range planning process.

### A Unique Framework

The District's Comp Plan has a unique framework. Federal Elements address federal lands and facilities and District Elements address all other lands and local municipal functions. The National Capital Planning Commission authors and approves the Federal Elements. The Government of the District of Columbia is responsible for the District Elements. This assessment addresses the District Elements and focuses primarily on the following questions:

- Is the Comp Plan used and understood by a wide-range of people and groups throughout the city?
- Could its format be improved?
- Does it address the key issues facing our city today, and does it include the necessary subject matter?
- Is it linked appropriately to other city plans?
- Is the process for amending the Comp Plan effective, fair and transparent?

Answering these questions helped OP to answer the most critical question: should the Comp Plan be comprehensively revised or should the Mayor initiate the existing process for amending it?

The differences between these two options are significant. *Revising* the Comp Plan will mean undertaking new analysis to understand issues and trends facing the District, refocusing the Comp Plan to better address these issues, re-writing significant portions of the Comp Plan, and revising its organization and format. Although many policies from the existing Comp Plan would be carried forward, the revised Comp Plan would look very different than the one in place today. *Amending* the Comp Plan, by contrast, will produce incremental changes that affect smaller elements of the

*"Instead of undertaking a rushed amendment process or simply delaying the process by a few months, I propose to initiate a thorough and inclusive review of the current Comprehensive Plan process."*

Letter from Mayor Williams to Council Chair Cropp, March 13, 2002

## Overview and Background

document but not affect its overall direction, organization, and format.

The Office of Planning turned to many sources to help answer these questions and to help assess preliminary recommendations: a 29-member Task Force appointed by the Mayor and Council; other key community, business, institutional and special-interest leaders; a consultant team known for its comprehensive planning expertise; District leaders and agency representatives; the Zoning Commission; the American Planning Association; and 'best

*This assessment has illuminated key opportunities to strengthen the Comp Plan, ensure that it is used more widely, and position it among a system of plans that serve the varied needs of the District.*

practices' research on Comp Plans across the country.

The recommendations are organized into two sets. The first set provides an opportunity to create a truly important and significant Comp Plan. The second would strengthen the role of planning in the District by creating a thoughtful and deliberate framework to allow citizens and leaders to make wise choices about the city's future.

### **How This Report is Organized**

The second section of this report (starting on the next page) summarizes OP's findings and recommendations. The third section sheds more light on the sources that contributed to the assessment and the Task Force process. The fourth section provides more detail on the analysis that supports each recommendation and includes Task Force views on each of the recommendations. The final section identifies next steps.

## Summary Findings and OP Recommendations

### II. SUMMARY FINDINGS AND OP RECOMMENDATIONS

#### A. Undertake a Major Revision of the Comp Plan

Our city is dynamic and evolving, facing new issues and challenges that should be addressed with new policies. The Comp Plan, adopted in 1984 and not comprehensively updated since then, did not anticipate the staggering increases in property values that have occurred in parts of the city, and the mounting financial burden that this trend places on middle to lower income groups. It also did not anticipate the growing threat of terrorism and its implications on land use, development, redevelopment, transportation, and urban design. The Comp Plan also does not provide adequate guidance on public facilities, local parks and recreation, the regional economy, or transportation.

Despite the passage of time, DC also continues to grapple with some of same challenges it faced 20

years ago, such as the exodus of African-American households (particularly families), and the prevalence of vacant and abandoned properties. Many of the policies in the 1984 Comp Plan that addressed these issues should be revisited, and many should be updated and augmented with new strategies and solutions.

In addition, many sources tell us – and OP agrees – that the direction articulated in the Comp Plan for the future of Washington, D.C. is unclear. This is a troubling observation given that the Comp Plan is intended to provide a city’s long-term vision and articulate its aspirations. These and other findings prompted the development of the two recommendations below:

#### As the First Step, Develop a Vision and Policy Framework that Articulates the Future Direction of Our City

This framework would be informed by an analysis of issues and trends relating to land use, housing, demographics, real estate, transportation, economics, and the environment as well as other issues. This analysis would identify the major challenges facing our city and establish broad principles to be used in revising the Comp Plan.

#### Revise the Existing Comp Plan

Based on the direction established by the vision and policy framework, revise and update the Comp Plan. While some policies are still relevant and should be carried forward, a major revision is necessary to make the Comp Plan a useful and effective document for public and private decision-makers. The revised Comp Plan should be based on and include an analysis of key trends, issues, and opportunities that would be examined as part of the development of a vision. Recommendations and policies would be linked to this analysis to ensure that they are substantiated. While the Comp Plan is being revised, the existing Comp Plan will remain in effect and will provide guidance to District agencies, the Zoning Commission, the City Council, and others.

## Summary Findings and OP Recommendations

### B. Create a More Functional and Dynamic Plan

To create a more functional and dynamic Comp Plan, both the content and the structure of the existing document need to be modified.

#### ***Plan Content***

#### **The Comp Plan Should be Reformatted and Reorganized**

A clear message OP heard from multiple sources (neighborhood leaders, institutional leaders, land use lawyers, and developers) is that a great divide exists between the people who know the Comp Plan well and “everyone else.” This comment was based on the observation that the Comp Plan is too big, is too difficult to find information within, is written in legal prose, and lacks graphics and maps.

The Office of Planning also heard that what the Comp Plan truly intends to “accomplish, protect

or encourage” is unclear – especially in areas where there are conflicting interests. In reviewing top comprehensive plans across the country, OP concludes that this lack of clarity about what the plan stands for is exacerbated by how it is organized. The Comp Plan is divided into topical chapters (such as land use, transportation, environment, historic preservation and others) and fails to integrate these issues. Understanding how these issues intersect will provide some direction on the city’s intentions and priorities during the next 20 years.

Another frustration OP heard is that the action steps in the Comp Plan are not clear and are not updated after the steps have been implemented. This and other related findings prompted OP to develop recommendations to improve the Comp Plan’s format and organization:

#### **Tell a Story**

The revised Comp Plan should ‘tell a story’ that helps to guide and inspire activities in the District. Telling a story will also increase the number of people across the city who read and understand the Comp Plan. It should be supported by maps, charts and graphs that help explain why certain policies are needed.

#### **Organize the Comp Plan Around Themes**

Instead of the traditional chapters such as land use, transportation, and the environment, organize the Comp Plan around themes, such as “sustainable neighborhoods.” Organizing the Comp Plan around themes will help to tell the story, understand how multiple issues are integrated, and help readers find information more easily.

#### **Create a Hybrid Plan**

The Comp Plan should address physical and economic aspects of the city primarily. It should also address the “spatial” aspects of social issues -- in other words, the physical or geographic implications of these issues. Examples could include a policy that considers the siting of small health facilities within schools to better address chronic health issues or policies that encourage childcare facilities within new commercial projects. In some instances, existing socially oriented plans that provide further guidance on these issues would be referenced.

#### **Establish Priorities**

The Comp Plan should set priorities among the recommended actions and identify who would be responsible for implementation in a clear “to do” list format. This list would indicate what needs to be done in the short-, mid- and long-term, and who should lead these efforts. This to-do list would be modified when the Comp Plan is amended to keep the lists up-to-date and accurate.

## Summary Findings and OP Recommendations

### Plan Structure

#### The Internal Structure of the Comp Plan Should be Improved

Stakeholders involved in this assessment have varying opinions about the effectiveness of the Comp Plan's "internal structure" – in other words, the relationship within and between the Comp Plan components. The current framework consists of the General Elements (citywide policies), the Ward Plans and the Small Area Plans.

Some policies, goals and actions expressed in the Ward Plans conflict with the General Elements. As a result, neighborhood groups, developers, lawyers, ANCs, and others say they use the Comp Plan "defensively" and often find themselves arguing before a decision-maker about what portion of the Comp Plan applies to a particular issue. While some citizens, neighborhood groups, ANCs, and others view the Ward Plans as a lynchpin for empowering and preserving neighborhoods, a closer look reveals other realities. Ward Plans vary greatly in scope and quality. Some provide guidance for specific neighborhoods, while others have no such guidance. Moreover, the influence of the Ward Plans is limited because a provision in the Comp Plan directs the Land Use Element to take precedence over all other elements (including the Ward Plans).<sup>1</sup>

Small Area Plans, which are built upon the foundation of the Comp Plan, could be used to help reconcile these conflicting issues and interpretations. However, Small Area Plans are not a part of the Comp Plan but instead serve as a "supplemental guide." In other words, decision-makers are not required to consider these plans in their decision-making. The Office of Planning examined how other cities have integrated area-specific plans into their Comp Plan and found that many cities, including Denver, Phoenix, and Kansas City, have successfully developed and adopted area plans

as part of their comprehensive plans. Such area plans provide more detailed recommendations than the citywide plans do.

Consequently, OP recommends that the structure of the family of plans be changed from citywide elements, Ward Plans and "supplemental" Small Area Plans to citywide elements and "Area Plans." This change is more than just semantic.

*"The neighborhood plan addresses issues and opportunities at a scale that is more refined and more responsive to specific needs than the city's Comprehensive Plan. The neighborhood plan serves as a component of that document."*

Ellen Ittelson  
Director of Planning Services, Denver

The District has developed only a few Small Area Plans since 1984, including the Anacostia Development Concept and the recently completed Takoma Plan. In contrast and as recommended on the next page, OP envisions that more areas of the city would be addressed by Area Plans and that these plans would be adopted as part of the Comp Plan. The size of an Area Plan could be more variable than that of a "Small Area Plan" and could encompass a few neighborhoods or cover an area as large as the Anacostia waterfront. In revising this planning structure, OP would need to dedicate substantial staff and resources to develop Area Plans for targeted areas. The Office of Planning is willing to take on this charge. Based on this commitment and other findings, the following recommendations were developed:

<sup>1</sup> Section 112.1(c) of the Comp Plan.

## Summary Findings and OP Recommendations

### Incorporate Relevant Policies from the Existing Ward Plans into the Citywide Elements

Many issues and policies articulated in the Ward Plans should be addressed in the citywide elements because they are much broader in geographic scope than the individual ward. One example is the Tree and Slope Overlay. Another is a Ward Plan policy that relates to the enhancement of “older established residential neighborhoods and areas, including ...Logan Circle, Shaw, Dupont Circle....”<sup>2</sup> This concept should be incorporated into a citywide element to ensure that similar neighborhoods across the city also are addressed.

### Develop Area Plans, Incorporating Relevant Policies from the Existing Ward Plans—Eliminate the Ward Plans

While there was value in developing the Ward Plans – they provided a framework for neighborhood-oriented planning in the city – it is recommended that they be replaced by the citywide elements and “Area Plans.” A review of the Ward Plans suggests that these plans have deficiencies and that the City would be better served by focused planning in smaller geographic areas. Area plans would be adopted by legislation and have the same legal authority as the citywide elements of the Comp Plan. In other words, the Land Use Element would not take precedence over Area Plans. For this reason it is imperative that Area Plans and the citywide elements do not conflict. To ensure this, all Area Plans must formally demonstrate their conformance with the citywide elements, which must be reviewed and agreed upon by the City Council as part of the adoption process. Neighborhoods and areas that do not have Area Plans would be governed by the citywide elements.

### C. Clarify the Comp Plan’s Relationship to Other Plans

Intent on addressing the challenging and changing issues in DC, numerous plans have been created by District agencies. One of the most common observations voiced to OP by people outside government is a confusion about the differences among plans, whether a hierarchy exists among plans, and whether “all those plans” are in fact needed. This lack of clarity has reduced the effectiveness of the Comp Plan. Moreover, the data these plans are based upon differs, which can lead to different assumptions about demographic and economic trends and result in conflicting recommendations. This assessment revealed to OP that the relationship of these plans to the Comp Plan should be clarified and that the same underlying data must be used for all plans.

The Office of Planning recognizes that the link between the Comp Plan and other plans is not one-way. In some cases, plans can be fully integrated into the Comp Plan because their purposes overlap completely with the Comp Plan. When this is done correctly, these plans can become implementation tools of the Comp Plan. The most clear example of this is the Transportation Vision Plan (TVP). When the TVP and the Comp Plan are completely aligned in the future, federal funds allocated to the District to implement transportation projects also will be implementing the Comp Plan. These and other findings led to these recommendations:

<sup>2</sup> Excerpt from Section 1327.1 of the Ward 2 Plan.

## Summary Findings and OP Recommendations

### Have Key Plans that Guide the Physical Environment Become Part of the Comp Plan

Transportation Vision Plan (TVP). In future updates (following the TVP revision now underway), the TVP and the Comp Plan should be developed and updated jointly. Federal funds and the CIP will implement transportation projects, thereby helping to implement the Comp Plan.

Public Facilities. The Comp Plan should provide more guidance by identifying the city's public facility needs and articulating broad policies for how and where new facilities should be sited. The CIP will help to implement public facility policies.

Parks and Recreation. A citywide parks plan does not exist. If that continues to be the case, the Comp Plan should be the plan that identifies the city's park and recreation needs, existing facility locations, and potential locations for new facilities. The CIP will help implement park and recreation policies.

### Identify Plans that are to be Informed by or that Inform the Comp Plan (but are not Elements of the Comp Plan)

These include:

The Citywide Strategic Plan (CWSP). CWSP is developed every two years, drawing from citizen preferences expressed at the Citizen Summits. Where there is overlap between the two plans, the CWSP will implement parts of the Comp Plan.

Safe Passages. Safe Passages is the District's action plan for the investment in children, youth, and families. The Comp Plan should be informed by Safe Passages and include relevant recommendations that relate to the location of facilities for children, youth, families, and elders.

Strategic Neighborhood Action Plans (SNAPs). SNAPs were an effort to identify neighborhood priorities, which were then used to inform the District budget. If SNAPs are to be updated, one option OP will consider is how the process can be used to identify neighborhood priorities for the Capital Improvement Plan (CIP) or to inform the City Wide Strategic Plan. The SNAPs would not be included in the Comp Plan, however.

### Strengthen the Link with Federal Government Planning Efforts

A new section of the Comp Plan should be created to address the intersection of federal and District issues. This will strengthen coordination efforts and help reconcile and address issues that are of importance to both federal and District interests.

### Use Common Projections and Assumptions for All City Plans

The assumptions included in the Comp Plan about population, housing, employment, etc., should be the same as for all planning efforts – housing plans, transportation plans, public facilities plans – so that all plans and policies use the same foundation.

## Summary Findings and OP Recommendations

### D. Ensure Comp Plan Implementation

In our research, OP found that implementation of the Comp Plan must be improved if the Comp Plan is to be used, viewed, and respected as the city's long-term plan. Other cities argue that successful implementation requires a combination of tools, coordination within the government structure, and commitment on the part of the Mayor and City Council.

*The most important proposal is linking the Capital Improvement Plan (CIP) to the Comp Plan.* Currently, individual agencies submit proposals to the Chief Financial Officer who conducts a financial evaluation and sends these proposals to the Deputy Mayors and the City Administrator. While the financial work is effective, little is done to evaluate proposals against the city's long-term goals. When meeting with other District agency directors to discuss the CIP process, one shared that "we must revise the way funds are distributed, based on comparisons of the entire system and take into account the big picture." Cities such as Philadelphia, Baltimore, Kansas City, Minneapolis, and Denver have found that this linkage is what propels many of their Comp Plan policies into action.

*"If you are not going to tie the major budgets to the comp plan and you are not willing to be honest in your assessment, then don't bother – you will lose credibility."*

Paul Farmer, Executive Director of the American Planning Association, talking with the Comp Plan Task Force, November 21, 2002

*Zoning is also an implementation tool.* In fact, the Home Rule Charter states that "zoning shall not be inconsistent with the Comprehensive Plan." This assessment generated several ideas on how to better support the Zoning Commission, and on ways to strengthen the Comp Plan's link to zoning.

Perhaps the most overarching observation that surfaced during this part of the analysis is that people – inside the government and out – are unaware of the progress on the Comp Plan goals and what still needs to be done. These and other findings prompted the development of the recommendations below:

#### Formally Link the CIP to the Comp Plan

Drawing upon models and common practice from other cities, OP would review and assess all Capital Improvement proposals annually. The Office of Planning would then prioritize the list using the Comp Plan and submit it to the City Administrator and Deputy Mayors during budget preparations.

#### Strengthen the Link to Zoning

One way to strengthen the link to zoning would be to prioritize all the changes needed to the zoning regulations (map and text changes) and submit this list to the Zoning Commission. Another would be for OP to work with the Zoning Commission to determine whether comprehensive (rather than piecemeal) updates to the zoning regulations can be accomplished. This would occur after major updates to the Comp Plan. OP also recommends that it develop and publicize a list of zoning actions that are needed to implement the Comp Plan. This list would be shared with the Zoning Commission, the Council, and the public (via OP's website). Lastly, after the Comp Plan has been revised, OP would then consider changing the "shall not be inconsistent" language to "shall be consistent with," the more common standard used throughout the United States. This change would require an amendment to the Home Rule Charter.

#### Monitor Comp Plan Implementation and Make Biennial Progress Reports

The Office of Planning would prepare biennial (once every two years) progress reports to track progress and help identify necessary amendments. The use of measurable indicators in the Comp Plan would help everyone understand what progress has been made.

## Summary Findings and OP Recommendations

### E. Improve the Amendment Process

Most local stakeholders OP consulted were unfamiliar with the Comp Plan amendment process. Those who have participated in the process, however, had plenty to say about its shortcomings. Among the concerns voiced were that:

- Amendments should not go through the approval process during an election year.
- People do not learn about amendments until it's too late to respond to them.
- Amendments may change significantly before or after Council hearings, highlighting the need for greater transparency (the ability to see the process clearly and openly from beginning to end).

- Some amendments that are accepted, analyzed and approved are inappropriate for inclusion in the Comp Plan (such as listing a detailed zoning change).

While this assessment focused on revising the Comp Plan, recommendations related to the amendment process are just as important. Some amendments that have been approved through the existing process have—one-by-one—slowly chipped away at the integrity of the Comp Plan. In some cases, policies that originally provided clear guidance have been watered down or, conversely, have become too specific and limited in scope. If this process is not rectified, a revised Comp Plan eventually will succumb to a similar fate. We – the public, OP and the Council – all must modify our roles. These and other findings prompted the development of the recommendations below:

#### Reduce the Timeline for the Comp Plan Amendment Cycle

The time needed to complete the amendment cycle would be reduced, and the process would not occur during Mayor and Council elections.

#### Increase the Level of Analysis Required for the Proposers of Amendments

Proposers of amendments would be required to provide more information and to conduct more up-front analysis. The Office of Planning recommends that the public's role in this phase be increased.

#### Improve the Process for Evaluating Proposed Amendments

The Office of Planning would conduct an impact analysis and publicize proposed amendments, as well as identifying which proposals are to be evaluated and forwarded to the Mayor.

#### Provide Planning Analysis When New Or Significantly Modified Amendments are Generated During the Council Approval Process

If new amendments are generated, or an amendment is significantly modified during the Council approval process, OP would conduct planning analysis and develop a recommendation. Once Council receives the information from OP, Council would hold another reading of the amendments.

## Summary Findings and OP Recommendations

### F. Consider a Planning Commission

Finally, as OP examined best practices in other communities, a key element that provided a clear and transparent planning framework was a Planning Commission. A Planning Commission is an appointed citizen body that guides and supports planning and related decisions. While most other big cities in the U.S. have a Planning Commission, the District does not.

The District should consider this structure for several reasons: 1) to support and enhance issues of transparency, 2) to review and recommend amendments cumulatively to help eliminate the

*"Without a planning commission and its connection to the city council, the city council would not have a way to appropriately address land use issues in the city."*

Robert Collins, City Manager, Kansas City

"chipping away" syndrome, and 3) to ensure that Area Plans are consistent with the Comp Plan. This prompted the development of the following recommendation:

### Evaluate the Merits of a Planning Commission

A Planning Commission would help ensure that proposed plans are reviewed adequately and are understood by the public before they are adopted. The Planning Commission would offer an independent voice in making recommendations to the Mayor and/or Council on Comp Plan updates and amendments. A commission also would make recommendations on related plans, such as Area Plans, and would review the Federal Elements of the Comp Plan and the federal CIP to assess impacts on the District. The Office of Planning would provide the necessary support to the Planning Commission. The Commission will not usurp the role of the Mayor and/or Council in any way. Rather, the Commission is intended to organize information and develop well-articulated recommendations to assist the Mayor and/or Council in their decision-making. This report outlines several options for the Planning Commission's composition and responsibilities. Additional study will be required before a formal recommendation can be submitted.

## Assessment Process

### III. ASSESSMENT PROCESS

This section describes the assessment process in greater detail. It begins by describing the sources OP relied upon to help analyze the Comp Plan, develop preliminary recommendations, and eventually finalize these recommendations. The section also provides the detailed chronology of the assessment process.

#### Information Sources

The Office of Planning was guided by input from six sources:

#### Comprehensive Plan Process Task Force

Task Force members were appointed by the Mayor and City Council. They represent a broad cross-section of constituencies. This group was designed to be small enough to be efficient but large enough to reflect a variety of interests and geographic areas of the District and to bring varied expertise to the discussions.

The Task Force was comprised of 29 voting members appointed by the Mayor and City Council. The Mayor also appointed eight non-voting ex-officio members. A complete list of Task Force and ex-officio members is included inside the front cover of this report. *Given the extensive role the Task Force had in this assessment, Task Force views on each recommendation are included in the next section of the report.*

#### External Stakeholder Interviews

During the summer of 2002, OP conducted a series of external stakeholder interviews to learn how the Comp Plan was used in planning, development, and policy decision-making. More than 20 stakeholders were interviewed, including representatives from ANCs, the Greater Washington Board of Trade, the Federation of Citizen Associations, the Federation of Civic Associations, the Chamber of Commerce, the Consortium of Universities, DC Agenda, George Washington University School's Department of Geography, DC Builders Industry Association, the local chapter of the American Planning Association, the Washington Regional Network, Washington Area



**Task Force members represent a broad cross-section of constituencies**

Bicycle Association, the Sierra Club, the Downtown Business Improvement District, the Committee of 100 on the Federal City, DC Heritage Tourism, a housing not-for profit, Community Partnership (homeless advocacy), D.C. Preservation League, the local chapter of the American Institute of Architects, and several land use lawyers.

#### Internal Focus Groups With District Officials

During September and October, the consultant team interviewed or conducted focus groups with more than 35 senior officials in the administration, including department heads, deputy mayors, and senior staff charged with planning responsibilities, to understand their impressions of the value of the Comp Plan in policy and decision-making.

#### Best Practices Research

The Office of Planning conducted a "best practices" analysis of comprehensive planning in other large cities in the U.S. and abroad. The analysis initially focused on seven cities in the U.S. with populations comparable in size to Washington (Minneapolis, Kansas City, Atlanta, Boston, Denver, Portland, and Seattle) and London, England (another national capital) for additional insight. As the assessment

## Assessment Process

### By Mayor's Order, dated July 24, 2002, the Comprehensive Plan Process Task Force was established to:

- Review and discuss major issues and trends confronting the District of Columbia as a city.
- Assess the strengths and weaknesses of the existing Comprehensive Plan's overall framework, content, and process for amending the Comprehensive Plan.
- Review and discuss "best practices" of comprehensive plans across the United States to help set goals to be accomplished with the District of Columbia's Comprehensive Plan.
- Provide input on the content of the existing Comprehensive Plan, in light of issues and trends confronting the District.
- Provide input on the overall framework of the Comprehensive Plan (e.g., the relationship between the Comprehensive Plan and other plans and policies).
- Provide input on the overall process for amending the Comprehensive Plan.
- Provide input and review of the final report.

progressed, the list of cities expanded to include in Philadelphia, Baltimore, Phoenix, and Raleigh.

#### A Consulting Team Led by HNTB to Advise OP

The consultants drew on their experience in other large cities around the country to provide ideas to strengthen the Comp Plan and the planning process. The team was supplemented by consultants who had a history of working on District planning and strategic planning activities. Their contributions were supplemented further by input from OP staff, who drew upon their experiences and insights into the D.C. planning process.

#### Public Roundtable

City Council Chairman Cropp led a public roundtable to discuss preliminary recommendations for improving the process, format, content and usefulness of the District elements of the Comprehensive Plan. Twenty-two individuals and/or organizations presented verbal testimony before City Council. Written testimony was submitted by 28 individuals and/or organizations. The Roundtable also provided an opportunity for City Council members to discuss and react to the preliminary recommendations and public comment.

## Chronology

### March 2002

Mayor Williams submitted the proposed Comprehensive Plan Amendment Act of 2002 to the City Council. The Act requested Council action to undertake a "thorough and inclusive review" of the Comp Plan process in lieu of submitting the plan amendments due to Council that month. Before submitting any further Plan amendments, the Mayor proposed that the Office of Planning conduct a review of the existing Comp Plan. This review would be guided by a Task Force.

### May 2002

The Council took no action on the proposed bill but in its place adopted Comprehensive Plan Process Sense of the Council Resolution 2002 (Resolution 14-431) in May 2002. The resolution requested that OP conduct an assessment of the Comprehensive Plan, stating that:

**It is the sense of the Council to concur with the Mayor's proposal....to establish a Task Force to review the process for amending the Comprehensive Plan and to recommend improvements to the process, format, content and usefulness of the Comprehensive Plan.**

## Assessment Process

The resolution further stated that the assessment was to be submitted to the Mayor and Council no later than February 2003 to provide the time needed to complete a review of the Comp Plan and planning process.

### July 2002

A consulting team led by HNTB was selected to advise OP. October 2002

The Office of Boards and Commissions confirmed the appointment of a Task Force. The Task Force's meetings are summarized below:

### November 12, 2002

#### Welcome and Introductions

The Task Force addressed startup issues and undertook an initial discussion of the Comp Plan, informed by results of a survey that had been distributed to members prior to the meeting. Draft ground rules were distributed. At a subsequent meeting, these were amended and agreed to by the Task Force.

### November 21, 2002

#### Review Comp Plans from Other Cities

At the second Task Force meeting, planning directors of three large cities discussed how and why they had updated their comprehensive plans. They included Robert Collins, former Planning Director of Kansas City, now City Manager; Ellen Ittelson, Director of Planning Services of Denver; and Paul Farmer, former Planning Director of Minneapolis, now Executive Director of the American Planning Association. The Task Force also heard the results of research and best practices assessment on the plans of seven cities.

### December 9, 2002

#### Assess the Comp Plan's Responsiveness to Current Issues and its Linkages to Other Plans/Policy Documents

The Task Force discussed the key issues that should be covered in the Comp Plan and highlighted issues that are not adequately addressed in the current plan. They also explored the need for better links and integration of other types of physical plans with the Comp Plan and the need for a tighter link



Julie Wagner, OP and Skip McKoy, Task Force Chair review final recommendations with the Task Force

between planning and zoning and planning and the capital budgeting process.

### December 18, 2002

#### Review the Amendment Process

The Task Force examined the amendment process and discussed how to improve it.

### January 15, 2003

#### Share and Discuss Preliminary Recommendations

The Task Force heard and discussed the consultant team's preliminary recommendations. Paul Farmer of APA offered his views and reactions to the preliminary recommendations and the related discussion.

### January 28, 2003

#### Public Roundtable to Discuss Preliminary Recommendations

Chairman Cropp held the public roundtable.

### February 13, 2003

#### Review and Discuss Final Recommendations

The Office of Planning reported its recommendations to the Task Force, which then reviewed and confirmed/revised Task Force views for inclusion in this report.

## **Assessment Process**